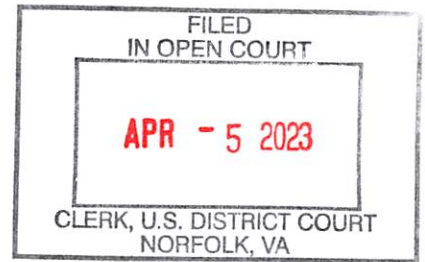


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division



UNITED STATES OF AMERICA)	CRIMINAL NO. 2:23cr20
)	
v.)	18 U.S.C. §§ 1708 and 2
)	Theft of Mail
DAHNICO JHARON MCCOY,)	(Count 1)
(Counts 1-4))	
)	18 U.S.C. § 1349
and)	Conspiracy to Commit Bank Fraud
)	(Count 2)
ISAIAH J. CARD,)	
(Counts 1-3, 5))	18 U.S.C. § 1344
)	Bank Fraud
<i>Defendants.</i>)	(Count 3)
)	
)	18 U.S.C. § 1028A
)	Aggravated Identity Theft
)	(Counts 4-5)
)	
)	18 U.S.C. §§ 982(a)(2)(A)
)	Criminal Forfeiture

SUPERSEDING INDICTMENT

April 2023 TERM - At Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about December 18, 2022, in the Eastern District of Virginia, the defendants, DAHNICO JHARON MCCOY and ISAIAH J. CARD, did unlawfully and knowingly steal, take, and abstract, and did attempt to, obtain, from and out of a mail, post office, and station thereof, letter box, mail receptacle, and any mail route and other authorized depository for mail matter, that is a U.S. Post Office blue collection box at the Chesapeake Main Post Office, a letter,

postal card, package, bag, and mail.

(In violation of Title 18, United States Code, Sections 1708 and 2.)

COUNT TWO

From in or about October 2022, and continuing through on or about December 18, 2022, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, defendant DAHNICO JHARON MCCOY, ISAIAH J. CARD, along with others known and unknown to the Grand Jury, knowingly and unlawfully combined, conspired, confederated and agreed together and with each other to commit the following offenses, that is:

- (1) to devise and execute a scheme and artifice to defraud and to obtain money, funds, assets, and property owned by and under the custody and control of a financial institution with deposits insured by the FDIC and NCUA, by means of material false and fraudulent pretenses, representations and promises, in violation of Title 18, United States Code, Section 1344.

WAYS, MANNER, AND MEANS

The ways, manner, and means by which the conspiracy was carried out included, but were not limited to, the following:

1. The purpose of the conspiracy was to obtain monies to which the co-conspirators were not entitled by stealing checks from mail items placed in the United States Postal Service (USPS) "Blue Boxes," altering the payee information to make the stolen checks payable to members of the conspiracy, and then using mobile apps to deposit the checks into co-conspirators' own bank accounts.
2. It was a part of the conspiracy that, on or about October 24, 2022, MCCOY,

CARD, and other co-conspirators both known and unknown to the Grand Jury, robbed a USPS Carrier of his “Arrow” Key, a universal key used to access USPS “Blue Boxes” that are placed throughout communities for the purpose of mail collection. An “Arrow” Key is used by USPS workers to open the “Blue Boxes” and retrieve mail that customers placed in the box. “Arrow” Keys are universal in a given postal zip code and can unlock any “Blue Box” in a particular zip code. The “Arrow” key obtained by the co-conspirators unlocked boxes located in Chesapeake, Virginia.

3. It was further part of the conspiracy that MCCOY, CARD, and other co-conspirators both known and unknown to the Grand Jury used the stolen “Arrow” key to repeatedly break into USPS “Blue Boxes” and steal the mail contained therein.

4. It was further part of the conspiracy that MCCOY, CARD, and other co-conspirators both known and unknown to the Grand Jury, sorted through the stolen mail seeking pieces of mail that contained checks and money orders.

5. It was further part of the conspiracy that MCCOY, CARD, and other co-conspirators both known and unknown to the Grand Jury, altered the stolen check and money orders to make them payable to a member of the conspiracy. They did this by “washing” the document, that is chemically erasing the original payee’s name and then writing a co-conspirator’s name on the “pay to” line of the check or money order.

6. It was further part of the conspiracy that MCCOY, CARD, and other co-conspirators both known and unknown to the Grand Jury, would then take the altered and forged check or money order and deposit it via mobile deposit to various financial institutions, and withdraw the ill-gotten proceeds.

ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of the conspiracy and to accomplish its objects, the co-conspirators and others known and unknown to the Grand Jury committed and caused to be committed the following acts, among others, in the Eastern District of Virginia and elsewhere:

1. On or about November 4, 18, 27, December 3, 10, 12, 14, 15, 2022, DAHNICO JHARON MCCOY, ISAIAH J. CARD, and other co-conspirators both known and unknown to the Grand Jury broke into various U.S. Post Office “Blue Box” collections boxes located throughout Chesapeake, Virginia, and stole the mail and other items contained therein.

2. On various unknown dates after the above referenced Blue Box robberies, MCCOY, CARD and other co-conspirators both known and unknown to the Grand Jury open the stolen mail in search of checks and money orders they could fraudulently alter and forge.

3. On various unknown dates, MCCOY, CARD and other co-conspirators both known and unknown to the Grand Jury, fraudulently altered and deposited stolen checks into the bank accounts of various co-conspirators.

4. On various unknown dates, MCCOY, CARD and other co-conspirators both known and unknown to the Grand Jury, recruited other co-conspirators to cash the fraudulently altered checks and deposit them into their various bank accounts.

5. On or about November 21, 2022, the exact date being unknown, MCCOY, CARD and other co-conspirators both known and unknown to the Grand Jury, fraudulently altered a check drawn on the Atlantic Union bank account of victim J.C. The fraudulently altered check was changed to make it payable to MCCOY and deposited in MCCOY’s Bank of America account.

6. On or about December 18, 2022, MCCOY, CARD and others both known and unknown to the Grand Jury, were observed breaking into a Blue Box collection box and stealing the mail and other items contained therein in Chesapeake, Virginia. MCCOY and CARD were arrested and a third suspect escaped on foot. CARD was discovered in a vehicle full of stolen checks and money orders, including several that had been changed to be made payable to MCCOY and several that had been changed to be made payable to CARD. A bag of stolen mail was dropped by one of the suspects during the pursuit.

(In violation of Title 18, United States Code, Section 1349.)

COUNT THREE

1. The allegations contained in paragraphs 1 through 6 of the Ways, Manners and Means, and paragraphs 1 through 6 of the Acts in Furtherance of the Conspiracy, in Count Two of this Indictment are realleged and incorporated as if set forth fully herein.

2. From in or about October 2022, and continuing through on or about December 18, 2022, in the Eastern District of Virginia and elsewhere, for the purpose of executing the above-described scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, the defendants DAHNICO JHARON MCCOY, ISAIAH J. CARD, along with others both known and unknown to the Grand Jury, did knowingly and unlawfully execute and attempt to execute and caused to be executed a scheme and artifice to defraud Atlantic Union Bank (AUB), a financial institution with deposits insured by the Federal Deposit Insurance Corporation (FDIC).

(In violation of Title 18, United States Code, Sections 1344 and 2.)

COUNT FOUR

On or about November 21, 2022, in the Eastern District of Virginia and elsewhere, the defendant DAHNICO JHARON MCCOY did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name, social security number, date of birth, and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendants used and caused to be used a means of identification, that is the name and bank account number of J.C. during and relation to violation of 18 U.S.C. § 1349, conspiracy to commit bank fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

COUNT FIVE

On or about December 18, 2022, in the Eastern District of Virginia and elsewhere, the defendant ISAIAH J. CARD did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name, social security number, date of birth, and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant possessed a means of identification, that is a Western Union Money Order with account number issued to an unknown victim, during and relation to violation of 18 U.S.C. § 1349, conspiracy to commit bank fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of any of the violations alleged in Counts One through Five of this indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of the violation.

2. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

(In accordance with Title 18, United States Code, Section 982(a)(2)(A).)

United States v. Dahnico Jharon McCoy, et. al.
Criminal No. 2:23cr20

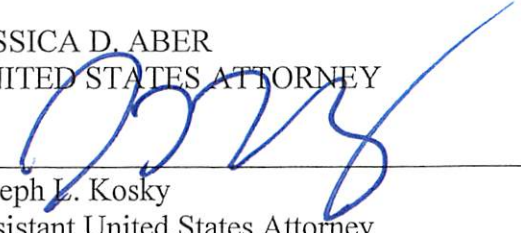
A TRUE BILL:

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

FOREPERSON

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UNITED STATES ATTORNEY

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